

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**CHRISTINE REEVES, also known as
CHRISTINE NEWMAN,**

and

VCARE USA LLC,

Defendants.

I, WADE OBERG, declare as follows:

1. I am 52 years old and I reside in Peoria, Arizona. I am a retired United States Navy service-member, following 20-years of active duty. I retired with the rank of Chief Petty Officer of Surface Warfare.

2. In June 2018, I became the victim of a fraudulent technology-support scheme. On June 8, 2018, I received a phone call from an individual named Johnathan Brown ("Mr. Brown"), who claimed to be affiliated with Microsoft. Mr. Brown sent me a document on Microsoft letterhead, purporting to show that he had completed Microsoft's professional training program and was indeed a Microsoft employee. The document even contained Mr. Brown's purported Microsoft employee identification number, 11526. I had experience working with and assessing many kinds of people in all sorts of situations during my Navy career, and Mr. Brown was very convincing.

3. Mr. Brown informed me that someone was attempting to hack into my computer, and he asked me to allow remote access to my computer, which I approved after receiving an on-screen prompt. Mr. Brown explained that he wanted remote access to my computer so that I could observe everything he was doing while assessing the “hacking” threat.

4. After Mr. Brown “assessed the threat,” he offered to install a security package and/or general technical-support services. I agreed to his offer, and I paid \$1,030 from my Wells Fargo bank account. Despite charging me so much money, his company never actually provided any services.

5. On June 11, 2018, I received a notification from Wells Fargo that I had been charged an additional \$1,030. I called the number that I had for Mr. Brown to discuss this unauthorized charge. The technician I reached informed me that he required remote access to my computer in order to view the second transaction, which I granted. After evaluating my computer, the technician informed me that the second charge to my account was because of a new issue on my computer that their company had fixed. This made no sense, and of course did not justify their helping themselves to more money from my bank account without my permission.

6. I later found that my account, without my authorization, was charged two more times, on June 13, 2018, for \$1,000, and on July 5, 2018, for \$1,020.

7. I realized only after reviewing my Wells Fargo bank statement that my June 8 and 11, 2018, payments had not gone to Microsoft, as I expected, but to a company called VCare USA LLC. The June 13 and July 5, 2018, payments went to a company called Itess Global LLC.

8. I highlighted the four suspect transactions on my bank statement and I took it to Wells Fargo for review. A representative at the bank said that someone would look into this

matter, but I never heard back from Wells Fargo. I also filed a complaint with the FBI's Internet Crime Complaint Center (IC3).

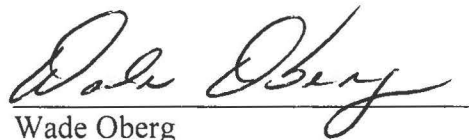
9. I was contacted numerous times by several VCare individuals after my initial dealings with them. However, I refuse to engage with anyone from VCare after they charged me four times for non-existent services. The VCare representatives I have had exchanges with include Jonathan Brown, Ronny Ray, Jordan Smith, Paul Harris, Mark Wilson, Gary Martin, David Smith, Ron Wilson, Ron Williams, and Mark Sanchez.

10. Earlier this week, on February 25, 2019, I telephoned these VCare USA LLC numbers from my notes to see if the company was still open. In each case, I asked to speak with the individual "to discuss an issue I was having with VCare." Either the person answering, or someone they transferred me to, said they were the person I was asking for, and confirmed that they were "with VCare." I hung up after confirming their name and that they worked for VCare. The people I called include:

Jordan Smith: 706-510-7649
Gary Martin: 855-598-5999
David Smith: 855-598-5999
Ron Wilson: 801-415-9325
Ron Williams: 801-415-9325
Mark Sanchez: 800-254-6089
Jonathan Brown } { 800-935-1758
Ronny Ray } { 866-663-1666

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: 17 Mar 19


Wade Oberg